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October 22, 1997

BY MESSENGER

Hon. Nancy E. McFadden
General Counsel
U.S. Department of Transportation
400 Seventh Street, S.W.
Room 10428
Washington, D.C. 20590

***Re: Computer Reservations System (CRS) Regulations,
Docket No. OST-97-2881 - 6***

Dear Ms. McFadden:

I am writing on behalf of Galileo International, Inc. We have obtained copies of the requests recently filed by The SABRE Group and WORLDSPAN seeking a 30-60 day extension of the deadlines for initial comments and reply comments in the above rulemaking proceeding. Galileo supports the requests for extension of the comment periods.

Galileo personnel and outside counsel have been working diligently to develop Galileo's initial comments since they obtained a copy of the Department's Advance Notice of Proposed Rulemaking, issued in September 1997. However, in view of the broad scope of the questions raised in the Department's notice and the need for comments to take full account of five to six years of developments in Galileo's history and in the CRS business as a whole, Galileo believes it would benefit from additional time in which to prepare its comments. The Department is also likely to benefit if all commenters have enough time to provide full responses to the numerous questions posed in the notice. Moreover, Galileo needs additional time to address the petition and comments filed by America West Airlines, Inc., on October 14, 1997. We obtained a copy of that filing on October 21. In its filing, America West makes sweeping factual assertions, many of which appear to be erroneous. The filing puts forward broad proposals designed to transfer to CRS vendors the role of enforcing travel agent booking policies that air carriers claim to

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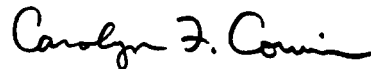
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want but apparently prefer not to impose directly on their own agents. Additional time would allow Galileo to provide a complete response to these wide-ranging allegations and proposals.

Galileo believes it would be appropriate for the Department to extend the deadline for filing of initial comments by 30 days and to extend the deadline for filing of reply comments by 60 days. The current schedule provides only 30 days for preparation of reply comments. Based on the experience of the rulemaking that culminated in the Department's 1992 revision of the CRS rules, there are likely to be a large number of initial comments filed, and the parties will need a full 60 days to review those comments and prepare adequate responses.

Thank you for your consideration.

Sincerely yours,

A handwritten signature in cursive script, reading "Carolyn F. Corwin".

Carolyn F. Corwin
Counsel for Galileo International, Inc.

cc: Docket Section